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December 10, 2019

VIA ECF

The Honorable Judge Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litigation*,
Case No. 1:05-MD-1720-(MKB)(JO)

Dear Judge Brodie:

We are writing to respond to the letter filed by Objector Jack Rabbit LLC suggesting that two special masters be appointed, one to exclusively resolve any disputes arising from claims made by “Branded and Unbranded Gas Station Owner[s]” and another one to address all other disputes or matters arising out of relating to the Settlement Agreement’s Plan of Administration and Distribution. *See* ECF No. 7807. Jack Rabbit provides no reason for its two special masters approach and there is none. A single special master is capable of both understanding and handling all matters or disputes arising out of or relating to the Plan of Administration.

In addition, Jack Rabbit’s proposed “rebuttable presumption in favor of the Branded or Unbranded Gas Station Owners” (ECF No. 7807) for determining disputed claims from the settlement fund for gas stations should be rejected as it is inconsistent with the procedures set forth in the Plan of Administration and Distribution for determining claims. The Plan of Administration and Distribution relies on objective information, such as data from Visa and Mastercard and other information supplied by potential claimants. Jack Rabbit’s proposed rebuttable presumption improperly treats gas station owners differently from any other potential disputed claimant by assuming the gas station owner is a proper claimant.

Respectfully submitted,

/s/ K. Craig Wildfang
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Thomas J. Undlin
**Robins, Kaplan, Miller
& Ciresi L.L.P.**

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cc: All Counsel via ECF

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